

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

ARTHUR DOE, *et al.*,

Plaintiffs,

v.

**JIM HOOD, Attorney General of the
State of Mississippi, *et al.*,**

Defendants.

Case No. 3:16-cv-00789-CWR-FKB

UNOPPOSED MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

Plaintiffs respectfully move this Court for leave to file an amended complaint pursuant to Fed. R. Civ. P. 15.

1. Plaintiffs' proposed amendments make a correction in an allegation of fact, add an additional detail in an allegation of fact, and clarify the nature of their due process claims. These amendments are necessary to ensure that the complaint is accurate and to more fully describe the nature of the constitutional issues at stake.
2. In paragraph 55, Plaintiffs amend the year of Arthur Doe's conviction from "1979" to the correct year, "1978."
3. In paragraph 22, Plaintiffs add an allegation that Defendants impose registration requirements on those with out-of-state convictions with "no notice or procedure for determining whether an out-of-state conviction should be deemed equivalent to offenses Mississippi designates as registrable."

4. In paragraph 94, Plaintiffs clarify that they allege that Defendants have violated both “substantive and procedural” due process rights.

5. Without agreeing that any allegation, assertion, or other matter in the First Amended Complaint is true or correct, Defendants do not object to Plaintiffs’ amending the complaint in this manner. However, Defendants expressly reserve and do not waive any rights or defenses to the amended complaint, including the right to file any responsive pleadings.

WHEREFORE, Plaintiffs respectfully move this Court for leave to amend the complaint.

Date: October 13, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Ghita Schwarz, hereby certify that true and correct copies of the foregoing document and the accompanying memorandum of law were filed electronically on October 13, 2017. Notice of these filings will be sent by email to all parties through the Court's electronic filing system. Parties may access these filings through the Court's CM/ECF filing system.

/s/ Ghita Schwarz
Ghita Schwarz, *pro hac vice*